

JOSEPH B. SALA, Ph.D.

1 A. I'm sorry?

2 Q. You're giving an opinion on
3 maintenance?

4 A. No, I think that I'm -- I'm speaking
5 about the job and task that -- and -- and -- and
6 way in which it was being conducted or -- or
7 instructed to be done and performed on the date of
8 the incident.

9 Q. You're not an expert, though, on
10 maintenance of rendering equipment, obviously?

11 A. I have not stated I was.

12 Q. And then on your -- your last
13 conclusion deals with the Riggs case and how you
14 think it's -- wasn't similar, correct?

15 A. Right. As I explained it in this
16 bullet point, this deals with the Riggs incident
17 and that it doesn't define a sequence of
18 reasonable and expected interactions.

19 Q. Do you have any other opinions aside
20 from what's contained in this report or what we've
21 discussed here today?

22 A. I do not think so. Not as I sit here.

23 Q. Do you anticipate on reviewing any
24 other material?

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Exhibit 13